UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE LITIGATION 21 MC 102 (AKH)

ROSA DIEZ (and husband, PANCRI DIEZ),

07-CV-5352 (AKH)

Plaintiffs,

NOTICE OF ADOPTION BY

-against-

BLUE MILLENNIUM REALTY LLC OF ANSWER TO MASTER COMPLAINT

80 LAFAYETTE ASSOCIATES LLC, ET AL.,

Defendants.

PLEASE TAKE NOTICE that defendant BLUE MILLENNIUM REALTY LLC (hereinafter "Blue Millennium"), as and for its response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, herein adopt Blue Millennium's Answer to Master Complaint, dated August 1, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, Blue Millennium demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York September 11, 2007

#### HARRIS BEACH PLLC

Attorneys for Defendant
BLUE MILLENNIUM REALTY LLC

<u>/s</u>/

Stanley Goos, Esq. (SG 7062) 100 Wall Street, 23<sup>rd</sup> Floor New York, New York 10005 (212) 687-0100

#### TO:

Paul Napoli, Esq.
Worby Groner Edelman & Napoli Bern LLP
115 Broadway, 12<sup>th</sup> Floor
New York, New York 10006

Robert A. Grochow, Esq. Robert A. Grochow, P.C. 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279

Gregory J. Cannata, Esq. Law Offices of Gregory J. Cannata 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279

## Liaison Counsel for Plaintiffs

James E. Tyrrell, Esq.
Joseph Hopkins, Esq.
Patton Boggs LLP
One Riverfront Plaza, 6<sup>th</sup> Floor
Newark, New Jersey 07102

Thomas Egan, Esq. Flemming Zulack Williamson Zauderer LLP One Liberty Plaza New York, New York 10006

# Liaison Counsel for the Defendants

All Other Defense Counsel

## **CERTIFICATION AS TO SERVICE**

The undersigned certifies that on September 11, 2007, I caused the following document to be electronically via the Court's ECF system:

> 1. Notice of Blue Millennium's Adoption of Answer to Master Complaint.

The undersigned further certifies that on September 11, 2007, I caused the aforesaid documents to be served via First Class Mail upon the following:

Paul Napoli, Esq. Worby Groner Edelman & Napoli Bern LLP 115 Broadway, 12<sup>th</sup> Floor New York, New York 10006

Robert A. Grochow, Esq. Robert A. Grochow, P.C. 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279

Gregory J. Cannata, Esq. Law Offices of Gregory J. Cannata 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279

Liaison Counsel for Plaintiffs

Dated: September 11, 2007

James E. Tyrrell, Esq. Joseph Hopkins, Esq. Patton Boggs LLP One Riverfront Plaza, 6<sup>th</sup> Floor Newark, New Jersey 07102

Thomas Egan, Esq. Flemming Zulack Williamson Zauderer LLP One Liberty Plaza New York, New York 10006

Liaison Counsel for the Defendants

Stanley Goos, Esq. (SG 7062)